

DRAFT
WRAP Board Meeting Minutes
Tempe Mission Palms
Nov. 12-13, 2002

Tuesday, November 12

1. Dianne Nielson called the meeting to order at 1:20 p.m. Governor Cyrus Chino of the Acoma Pueblo gave the invocation. The agenda was approved as presented.
2. Dana Mount moved and Ralph Gruebel seconded approval of the minutes from the July 2002 Board Meeting. The minutes were approved unanimously.
3. Bill Grantham informed the group that Lewis McLeod was nominated by the Tribal Caucus to replace Bobby Ramirez as the tribal TOC Co-Chair. Kesner Flores (Cortina) was nominated for a one year extension on the IOC and Cisney Havatone (Hualapai) was nominated for a three year term to the IOC. Patrick Cummins stated that Andy Ginsburg's term on the IOC would be expiring at the end of the year but that the State caucus had not yet nominated a replacement. Lee Gribovicz and Steve Arnold were nominated to replace Dana Mount and Mike George as state representatives on the TOC, with Mr. Gribovicz serving as state Co-Chair. The appointments were approved unanimously by the Board.
4. Patrick Cummins presented the financial status report. He noted that 94% of the 1999/2000 grant funds have been expended, and that 81% of the 2001 funding has been obligated, with 31% expended.
5. Status of Annex Rulemaking: Patrick Cummins discussed the status of the Annex Rulemaking. He said that EPA had published the Annex for public comment, comments were received and are being considered by EPA, and EPA is in the process of finalizing the rule. The expectation was for a final rule to be published sometime around March 2003. Andy Ginsburg asked about whether there was an update on the Circuit Court decision regarding the regional haze rule. Robbie Roberts responded that EPA was examining how to best comply with the Court's decision, and that proposed changes to the regional haze rule would not be expected until the fall of 2003. Patrick Cummins noted that EPA will probably pursue changes to SIP submittal dates as part of the TEA-21 legislation reauthorization. Dianne mentioned that the WRAP co-directors would continue to monitor this issue.
6. The Co-Chairs presented awards to Mike George, Lee Gribovicz, Bobby Ramirez, Dana Mount, Andy Ginsburg, John Kowalczyk, for their years of service to the WRAP and recognized the important contributions of all the members of the IOC, TOC and forums.
7. Bill Grantham mentioned the National Tribal Air Association has been formed and that the first meeting was in Wisconsin in October where the bylaws were adopted. He also

introduced Bob Gruenig who has been working on WRAP and other tribal issues for NTEC. Bob's efforts have resulted in the identification of 2 tribal representatives for the Dust Forum, 2 for Fire, and 1 each for Economics, In&Near, and AQ modeling. In addition, at least 15 others have expressed interest and may become involved. Bill also noted that NTEC will be hiring a communications person.

8. WRAP 2003 Work Plan approval. Rick Sprott presented some background on the work plan for 2003 and elaborated on the IOC portion of the work plan (presentation is available on the WRAP web site). Tom Chapple discussed how Alaska is being integrated into the work plan over the next year. Lynn Terry requested that the WRAP be sure to participate in the upcoming EPA rule making on non-road mobile sources. Chris Shaver requested that the WRAP track international issues. Patrick Cummins noted that Rich Halvey of the WGA staff is involved with international projects related to inventory and energy, and is coordinating with CENRAP.

Mike George presented the general outline of the TOC forum workplan and budget requests (presentation is available on the WRAP web site). Patrick Cummins noted that the WRAP has started to sketch out a longer term work plan for 2004-2008. He said that a report on that effort would be available at the next Board meeting.

Andy Ginsburg requested that on page ES-2, last paragraph, that the the following sentences be revised as shown here:

~~“Most WRAP members will not have to contend with ongoing ozone and particulate matter nonattainment issues, This which simplifies air quality planning to some extent but the clear threat to public health may detract attention from the region’s air quality programs. MANY WRAP MEMBERS ARE FACED WITH RAPID POPULATION GROWTH WHICH WILL CONTINUE TO PRESENT A CHALLENGE TO PREVENTING DETERIORATION OF GOOD AIR QUALITY IN THE WEST.”~~

Andy also suggested the following revision to the last paragraph of the Executive Summary on page ES-3:

~~“In the long term, the WRAP must WILL continue to examine and develop innovative market-based approaches to achieving emission reductions. Examples include the POSSIBLE expansion of the SO2 backstop market trading program to include additional states and/or tribes, and possibly additional pollutants and source sectors. THE WRAP WILL ALSO EXPLORE REGIONAL MARKET INCENTIVES FOR ENERGY EFFICIENCY AND RENEWABLE ENERGY STRATEGIES.”~~

Bob Saunders mentioned that exposure to low levels of particulate matter have been shown to cause health impacts; therefore further health benefits may be obtained even if an area is already in attainment

On page 38, Bill Grantham noted that up to \$50,000 was to be set aside for a tribal coordinator for Alaska, rather than being a potential use of the Program Enhancement fund, and the budget should reflect this. Tom Chapple agreed that the budget should be clarified to reflect this line item. Ric Tobin moved, Tom Chapple seconded approval of the workplan with the changes above. The motion was approved unanimously.

9. Jeff Burks presented the findings and policy recommendations of the air pollution prevention forum (presentation is available on the WRAP web site). Jeff noted that the draft final report is included in the Board materials but that the focus of the presentation is on the policy statements and management directives.

Governor Chino asked how much the tribes were involved in developing the policy statements. Jeff responded that there is a tribal working group that was part of the review process and that it also went to the tribal members of the IOC. Governor Chino commented that the policies have the potential to impact on the sovereign powers of the tribes and that the tribes might need additional time to consider the recommendations before endorsing them. Jeff added that the final report on the recommendations of the Forum will have a thorough and comprehensive review before it is presented to the Board. He explained that the policy statements are intended to provide guidance to states and tribes rather than a specific set of required actions. Dianne Nielson said that the objective of the Forum work was to assist states and tribes in the development of SIPs and TIPS, but that the work shouldn't be viewed as a requirement for states and tribes to include in plans. Ric Tobin said he supported Governor Chino's concerns and that Arizona thought there should be more emphasis on solar energy in the report, but that the policy statements were not dictating what they had to do and that Arizona still had the ability to include programs on their own.

Chris Shaver asked if the AP2 Forum could take up the issue of transmission management practices. Jeff responded that this was an important issue to discuss regionally and that this is being done by the new regional transmission organizations. John Nielson added that the WRAP and the states can work to influence these regional transmission organizations. Bob Saunders asked about the status of renewable energy certificates. Jeff responded that it is a policy of the WGA and that there are efforts to organize a stakeholder meeting to determine how such a program can be implemented in the West. Dana Mount asked about including the Dakotas in a certificate program. Jeff responded that it was already assumed that they could participate, since it is possible to trade between different interconnects. Stanley Paytiamo suggested that the report could say more about cultural issues, especially in relation to tribes, such as the visual impact of wind farms. Andy Ginsburg suggested adding the phrase, "while protecting cultural resources," at the end of the first sentence of the Policy Statement and at the end of policy statement 10. Ric Tobin noted that the GCVTC did not actually discuss protection of cultural resources. Andy suggested that in lieu of adding language to the first sentence of the policy statement, a second sentence would be added to the effect that the WRAP believes this can be done while protecting cultural resources. Andy Ginsburg moved,

Chris Shaver seconded approval of the policy statement with the changes suggested. There was a comment that the 10% and 20% reductions from existing levels over 10 and 20 years respectively can be overcome by growth. This was clarified that the percentage reductions relate to generation in future years.

Julie Simpson suggested additional changes. In the first sentence, adding states AND TRIBES and in the management directive, adding assisting the Western Governors' AND NTEC. Ric Tobin asked if that changed the nature of the GCVTC recommendations. Dianne responded that it does not change what was being said in the GCVTC report, but that it recognizes what the intent of the report was all along. Ric suggested that it is important to make sure the report is written correctly so that what is being said is both accurate and sensitive to Native American cultural concerns. He suggested doing a rewrite and bringing it back to the Board on Wednesday for final consideration. The Board concurred. Andy Ginsburg said that if the Forum was going to develop analytical tools for the states to use, that should be added to the policy statement. He also suggested that it would be important to recommend coordinated and consistent policies developed from collaboration between state energy and air quality offices. Diane asked if on the second issue that could be handled as a directive to the Co-Directors to ensure that coordination occurred. Andy agreed it could be done that way.

Wednesday, November 13

10. Justin Gould from the Nez Perce tribe presented Governor Chino and Dianne Nielson with gifts of appreciation for the work they have done for the WRAP.
11. Andy Ginsburg presented the changes to the WRAP Policy on Renewable Energy and Energy Efficiency agreed upon by the drafting group (a copy of the final policy statement is available on the WRAP web site). Andy also offered a motion to approve the policy and follow through on the management directives. Dana Mount seconded. Lynn Terry suggested that the use of the term "consistent policies" in the motion may not recognize that some states or tribes might move at a different pace. Andy agreed to delete the word "consistent" and the following motion was approved unanimously.

"Move that the WRAP adopt the Policy on Renewable Energy and Energy Efficiency as amended and dated November 13, 2002. The WRAP directs the AP2 Forum and the IOC to complete the annotated policy with ample review by all WRAP members, stakeholders, and other interested parties, and to present the final document to the Board for approval at its next meeting. The WRAP further directs the IOC to implement the management directives contained in the Policy, and to encourage state and tribal energy and air quality officials to collaborate in implementing renewable energy and energy efficiency policies in the region."

12. John Kowalzyk presented a status report on mobile sources and road dust (a copy of the presentation is available on the WRAP web site). John presented information that both

on-road and total mobile source emissions all trend downward in the 309 planning period. Further reductions in nonroad emissions are expected because of imminent revisions to the emissions model and expected new regulations. One of the most significant findings of the modeling work is that 80% of the mobile source contribution to visibility impacts in 2018 are from nonroad sources and that these will continue to be of concern in the future. The Mobile Source Forum agreed that EPA should expeditiously adopt and implement new engine and fuels standards for nonroad sources and that the WRAP may want to coordinate regional demonstration projects to show the potential for reducing nonroad emissions.

John discussed making significance determinations. The Mobile Sources Forum has not yet reached consensus on an approach to this issue. John presented the road dust recommendations. The Forum was able to reach consensus on these recommendations, concluding that road dust is not a significant contributor to visibility impairment but that the issue must be studied further and may need to be addressed in the Section 308 plans.

John presented the following as possible WRAP actions: supporting one of the alternatives presented, giving the Forum more time to reach consensus, directing the Forum to prepare a suite of some alternatives for states and tribes to consider, or not providing any guidance other than modeling results.

Andy Ginsburg asked why nonroad and on road sources were lumped together, especially since remedies for each are different. John responded that at least one of the alternatives does separate them. Bob Saunders asked why Phoenix was used in the modeling. John responded that to date modeling has been done for California and Las Vegas also as these are the largest urban areas near the Colorado Plateau. Lynn Terry commented that the WRAP needs to continue to push for both on-road and off-road reductions, aside from the issue of significance determinations. Bob Neufeld commented that the WRAP needed to consider not just whether sources are significant, but to ensure that any strategies that may be implemented will actually lead to emission reductions.

Chris Shaver suggested that the Forum could prepare a letter to EPA to be signed by the WRAP co-chairs supporting the new standards for nonroad sources. Chris Shaver moved and Bob Saunders seconded a motion to have the Forum prepare a letter to EPA for WRAP signature supporting new standards for nonroad sources. Andy Ginsburg requested that the letter stay simple and to the points of the Forum recommendations. Dan Olson asked that locomotives be included in the recommendation. Dianne Nielson asked the co-directors to set up a conference call for review of the letter. The motion passed unanimously.

Chris Shaver suggested that, if EPA agrees, the requirement for making findings on “significant” contributions could be replaced by a commitment to a declining regional cap. Chris Shaver moved and Ric Tobin seconded a motion that the WRAP discuss with EPA the alternatives for determining whether or not mobile sources are significant for the

purposes of Section 309. Ric Tobin said that Arizona would support moving forward with a discussion with EPA on this issue. Andy Ginsburg said that in approaching EPA, the WRAP should present alternatives that it believes are viable. Ric Tobin responded that it would be best to find a single alternative to recommend to the WRAP. The motion passed unanimously.

Ric Tobin moved and Lynn Terry seconded a motion that the WRAP accept the forum's finding that paved and unpaved road dust sources are not significant in contributing to regional visibility problems and that the WRAP support an effort to evaluate retrofit programs for nonroad sources. Chris Shaver asked if mobile source emissions are going down, why are ozone levels going up. John responded that other sources are contributing, many of the mobile source reductions have not yet occurred but will occur in the future, and that we are presently in a warming trend, which does have an effect on ozone production. The motion was approved unanimously.

Lewis McLeod wanted to make sure the motions reflected that the finding of non-significance for road dust only applied to regional haze problems, not localized impacts.

Andy Ginsburg noted that the mobile significance question is one of many for which EPA guidance is sought. For Oregon, the highest priority question is whether committal SIPs will be acceptable in 2003.

13. Governor Chino and Dianne Nielson presented Duane Yantorno with an award for his service to the WRAP.
14. Work Group Recommendations for Addressing Clean Air Corridors in Section 309 Plans. Brian Finneran made a presentation (presentation and WRAP policy are available on the WRAP web site). Chris Shaver asked about whether emissions increases had occurred since the GCVTC had made its recommendations. Brian responded that the work group looked at the period beginning in 1990. Justin Gould said that it seemed that the work group was validating a previous report and quantifying the amount of clean air. He noted that much of the northern part of the CAC included ceded territory of the Nez Perce, Warm Springs, and other tribes. He noted that the use of county boundaries might imply state jurisdiction. Nonetheless, he suggested that the report should be adopted as quickly as possible so that further progress can be made. Brian added that there will be a continuing need to reevaluate the boundaries of the corridor and that the tracking element was critical. Rich Fisher said that emissions in PSD areas are not being effectively tracked presently. Andy Ginsburg clarified that the recommendations were just addressing keeping the 20% cleanest days clean. Lewis McLeod asked if any work had been done for other states in the WRAP that are not using section 309 to prepare SIPs. Brian did not believe that any work had been done. Lewis then asked how the section 308 states would respond. Brian answered that the Clean Air Corridor requirement was not applicable to those states. Patrick Cummins added that the question of keeping clean days clean will be addressed in all the regional haze plans because it is required in EPA's

rule. Ric Tobin moved and Dan Olson seconded approval of the work group recommendations. Chris Shaver suggested that the first policy statement be modified to reflect that emissions were compared to “a” 1996 baseline instead of “the” baseline, and to add language to note that this was for the clean air corridor. The motion with the suggested change was approved unanimously.

15. Update on STIP-II Work Group. Brain Finneran made a presentation (presentation is available on the WRAP web site). The STIP-II project is designed to build a template for section 309 regional haze implementation plans. The project will also produce a technical support document that will be submitted as part of the 309 plans. The draft model STIP is scheduled for January or February of 2003, with final deliverables in May 2003. Larry Svoboda from EPA mentioned that EPA would be meeting in the next few weeks to discuss consistency issues among regional offices. Andy Ginsburg said that the process has to include getting questions answered by EPA as they come up, and he wondered if the EPA representatives to the project will have the ability to answer questions during the actual process discussions. Larry Svoboda assured the group that EPA would do everything possible to reach a consensus on the STIP template. Lewis McLeod noted that no health-based TIPs have yet been approved and asked if the tribes could count on EPA to help tribes with technical and legal support in the preparation of haze TIPs. Larry Svoboda responded that EPA was committed to working with the tribes to support TIP processes. Lewis McLeod reminded the work group to account for tribal cultural and legal (jurisdictional) issues as part of the template. Stanley Paytiamo requested that the template be prepared on CD. Bill Grantham also mentioned that tribes have the option of potentially severing sections of 309 and that this complicates the process. He also noted the need for collaboration between this project and efforts at TIP/FIP development within EPA regions and OAQPS. Rosanne Sanchez mentioned that John Cox, Randy Ashley, and Asa Lavender were representing the tribes in the STIP process. Lewis McLeod asked about the budget. Patrick Cummins pointed out that the budget document shows \$66,000 in the current year budget and additional funds for the next year’s budget for contractual services, in addition to the funding for Brian Finneran and Roseann Sanchez to support the effort.
16. Fire Emissions Joint Forum Recommendations. Pete Lahm presented recommendations for the Enhanced Smoke Management Plans, Annual Emissions Goals, and Fire Tracking Systems for 309 Plans (presentation and WRAP policy documents are available on the WRAP web site).
There were no comments from the Board on the Enhanced Smoke Management Plans.

On the Annual Emissions Goals, Bill Grantham pointed out that the table in Appendix C needed to be clarified with regard to the exemption of Native American cultural vegetative and non-vegetative burning. Chris Shaver asked if the Forum had considered incentives for emissions reductions after the annual emissions goal was achieved. Pete indicated that it had not been formally discussed by the Forum. Chris asked if fuel was removed and used elsewhere, would that count as an emissions reduction technique. Pete

indicated that if it was removed as part of a fuels reduction program it would count, but if it was being done for other reasons, it might not count. Andy Ginsburg asked if the early use of alternatives and the tracking of non-burning alternatives could be incorporated into the policy. Stanley Paytiamo asked how wood-burning emissions would be tracked. Lee Gribovicz responded that the emissions inventory has categories to account for different kinds of wood burning. Pete added that wood removed for burning outside the forest could count as an ERT and the emissions would be captured as part of the inventory. Lewis McLeod asked how transboundary issues would be handled. Pete said that regional coordination and collaboration is emphasized in the enhanced smoke management program, but that it is important to look at individual projects. Asa Lavender asked about cost per acre calculations. Pete indicated that there was not good cost data available, but that the collaborative process would help determine efficient and cost effective cost techniques. Stanley Paytiamo asked about ditch burning. Pete noted that ditch burning is part of the plan, but that it is primarily handled by individual states. Dan Olson mentioned that the work of the FEJF provided techniques that can be used to evaluate fire regardless of whether a state is preparing a SIP under section 308 or 309. He asked why it was necessary to include the policies as a specific submittal under section 309. Pete explained that it was a specific requirement. Justin Gould asked if the work of the FEJF could be used to help support budget requests that could be used by stakeholders to reduce fuel levels or manage forests. Rich Fisher responded that the Forest Service is making efforts to link the NEPA process with air quality, but that the best thing to do at present is to become involved with the Forest Service planning processes.

On the Fire Tracking Systems, Brian Finneran asked how the policy deals with situations where tracking may not be occurring. Pete responded that the policy anticipates states establishing tracking systems for all burning sources. Andy Ginsburg asked about tracking alternatives. Pete responded that the Forum would consider it. Rich Fisher commented that information is being or will be collected, either through remote sensing, on the ground tracking, or modeling.

Ric Tobin moved, Dan Olson seconded acceptance of the Enhanced Smoke Management Policy. Ric Tobin moved Doug Lempke seconded a motion that the policy statements A-G in the Annual Emissions Goal be accepted. Ric Tobin moved, Tom Chapple seconded a motion to endorse the work of the Forum on the fire tracking systems but wait for completion of public comment before taking formal action. Ric Tobin moved, Dan Olson seconded a motion to have a process to seek approval of the full AEG report and the Fire Tracking Systems report as soon as they are ready for final consideration. Ric Tobin moved, Andy Ginsburg seconded that the Forum move forward with preparation of a white paper on alternatives to burning. All motions were passed unanimously.

17. The next meeting was set for April 2-3 at a location to be announced.
18. The meeting was adjourned at 3:05.

WRAP Board Meeting Attendees
Tempe Mission Palms
Nov. 12-13, 2002

WRAP Board Representatives

Gov. Cyrus J. Chino	Co-Chair, Pueblo of Acoma
Dianne Nielson	Co-Chair, State of Utah
Dana Mount	North Dakota Dept. of Health
Jay Littlewolf	Northern Cheyenne Tribe
Stanley Paytiamio	Pueblo of Acoma
Lloyd Irvine	Confederated Tribes of Salish & Kootenai
Justin Gould	Nez Perce Tribe
Robert E. Roberts	U.S. Environmental Protection Agency, Region 8
Doug Lempke	State of Colorado
Bob Saunders	State of Washington
Steve Pedigo	USDA Forest Service
Ric Tobin	Arizona Department of Environmental Quality
Dan Olson	Wyoming Department of Environmental Quality
Ralph Gruebel	New Mexico Environment Department
Steve Welch	Montana Department of Environmental Quality
Chris Shaver	National Park Service
Cisney Havatone	Hualapai Nation of the Grand Canyon
Farshid Farsi	Shoshone-Bannock Tribes
Tom Chapple	State of Alaska
Lynn Terry	State of California
Andy Ginsburg	State of Oregon
Bill Grantham	Co-Director, NTEC
Patrick Cummins	Co-Director, WGA

General Attendees

Wayne Leipold	Phelps Dodge
Mark Mahoney	ARMY
Marius Gedgaudas	U.S. AEC
Rick Sprott	Utah Division of Air Quality
Bob Palzer	Sierra Club
Pat Thompson	National Park Service
Carl Bowman	National Park Service - Grand Canyon
Shawn Kendall	The Kendall Group, Inc.
John Nielsen	Land & Water Fund
Asa Lavender	White Mountain Apache
Don Arkell	WESTAR
Rich Fisher	USDA Forest Service
Larry Svoboda	U.S. Environmental Protection Agency, Region 8
Julie Simpson	Nez Perce Tribe

Bob Neufeld	Wyoming Refining
Brian Finneran	Oregon Department of Environmental Quality
Rosanne Sanchez	New Mexico Environment Department
Ira Domsky	Arizona Department of Environmental Quality
Ondrea Barber	Ft. McDowell
Bob Habeck	Montana Department of Environmental Quality
Bill Stafford	Basin Electric
Darla Potter	Wyoming Department of Environmental Quality
Mary Uhl	New Mexico Environment Department
Nancy Wrona	Arizona Department of Environmental Quality
Colleen McKaughan	U.S. Environmental Protection Agency
Tom Webb	U.S. Environmental Protection Agency, Region 9
Mark Komp	U.S. Environmental Protection Agency, Region 8
Jeff Yockey	TEP
John Kowalczyk	WESTAR
Dan Clark	Wyoming Department of Environmental Quality
Bob Gruenig	National Tribal Environmental Council
Bill Wiley	Pinnacle West
Pat Murdo	WRAP Communications
Lee Gribovicz	Wyoming Department of Environmental Quality
Lily Wong	U.S. Environmental Protection Agency, Region 9
Virgil Masayesva	NAU/ITEP
Dennis Schwehr	West Associates
Tom Moore	WGA
Lee Alter	WGA
Karen Deike	WGA
Richard Halvey	WGA